



July 2, 2026

BEL 221111

Theyonas Manoharan
Fergus Development Inc.
3190 Steeles Avenue East, Suite 300
Markham, ON L3R 1G9

via email: theyonasm@geranium.com

Re: Environmental Impact Study Addendum - Fergus Golf Club, Township of Centre Wellington, County of Wellington

Dear Mr. Manoharan:

Beacon Environmental Limited (Beacon) was retained by Fergus Development Inc. to prepare an Environmental Impact Study (EIS) Addendum for the proposed redevelopment of a portion of the Fergus Golf Club, located at 8282 and 8243 Wellington Road 19, Township of Centre Wellington, County of Wellington (hereafter referred to as the "subject property"). The location of the subject property is illustrated in **Figure 1**.

Fergus Development Inc. intends to develop the subject property for residential use and has received Draft Plan Approval from the Township of Centre Wellington for Draft Plan of Condominium 23CD-22001. Previous EISs and addenda were prepared by Beacon in support of the development application and Site Alteration submissions. The original EIS was provided in February 2022, which was followed by an updated EIS (April 2023) and EIS Addenda (December 2023 and July 2024) (**Attachment A**).

It is understood that due to market conditions and other considerations, Fergus Development Inc. is proposing a change to the development plan from 118 single lots on a private condominium road to 446 units on municipal right of ways. This third EIS Addendum relies on the findings of the previous EIS and addenda submissions and is intended to address changes to the proposed development plan and associated impacts on natural heritage features. This EIS Addendum includes a consolidated list of mitigation and enhancement measures to protect, restore, and enhance the natural heritage features associated with the subject property.

Existing Conditions

Vegetation communities documented on the subject property through the previous EIS are illustrated in Figure 2. Natural heritage features on the subject property include a woodland and wetland feature within the central portion of the subject property (ELC units 8b, 8c, 8d, 9, 10c and 12c). The previous EIS identified a number of other woodland and wetland features on the subject property (ELC units 5a, 5b, 7, 8a, 10a, 10b, 11a, and 11b) which were approved by the Township and GRCA for removal under the previous development plan. These features were removed as part of site preparation works for the previous development plan, which commenced in spring 2024.

The Black Drain traverses the subject property. This municipal drain was historically created (i.e., dug) to collect surface water runoff from surrounding agricultural lands. It functions primarily as a stormwater discharge channel for upstream areas. Overall, based on observations, water conditions and flow, the Black Drain within the subject property is considered as poor fish habitat and no fish were caught during fish community sampling. The northern portion of this watercourse within the subject property was abandoned as a municipal drain in 2023, while the southern section, which runs along the eastern property remains as a municipal drain.

Description of the Proposed Development

The proposed development consists of 446 residential lots accessed by a public road network. The unit count is increased from the previous plan; however, the general layout of the proposed development is similar to what was previously proposed and approved for the subject property (Draft Plan of Condominium 23CD-22001). The proposed development is illustrated in **Figure 2**.

The proposed development will be serviced by a gravity sewer network that will convey flows to a pumping station located across from the stormwater management (SWM) block, which is the same location as the previously approved plan (**Figure 2**). A forcemain is proposed to transfer flows to the golf course lands north/east of County Road 19, where it will be processed through a treatment facility, which is consistent with the previous development plan. From there, the treated effluent is proposed to be conveyed and outlet to either the Belwood Lake or the Grand River, which will be evaluated through an addendum to the approved Environmental Assessment (EA) for the development. The location of the sanitary sewer outlet to the proposed receiver is being addressed through the EA addendum process. For details on site servicing, refer to the (Burnside2026).

As with the previous development, stormwater will be captured in the storm sewer system, which will convey flows to a SWM pond. The SWM pond will provide the required water quality and quantity controls to meet provincial and municipal standards prior to discharging to the Black Drain. Refer to the Stormwater Management Plan (Burnside 2026) for details.

The previously approved plan included a pedestrian trail through a woodland. The proposed development now includes sidewalks throughout the subdivision on one side of the streets and a direct connection to the golf course via an underpass within the park; therefore, this trail is no longer necessary and is not proposed within the subdivision.

Impact Assessment and Mitigation

This section discusses impacts of the proposed development on natural heritage and hydrologic features within the subject property and should be read in conjunction with previous EIS submissions.

Wetlands

The proposed development will result in the removal of 0.71 ha of wetland, which is consistent with the previously approved development. A wetland restoration and enhancement plan was previously prepared to mitigate this impact (Beacon 2024).

The previously approved development plan maintained an existing wetland within the central portion of the subject property. The currently proposed development also maintains this wetland area. Based on a review of the preliminary grading plans (Burnside 2026a), the development limit around this wetland

area has not changed substantially from that which was approved under the previous plan. The grading for the previously approved development extend approximately 5 m into the wetland buffer at the northeast corner of the wetland feature. Under the currently proposed grading plan, no grading is required within the wetland buffer.

Under the previous development plan, external drainage entering the subject property from Third Line was collected in a storm sewer and conveyed to the SWM pond. Under the proposed development, external drainage will be piped and outlet to the wetland in the central portion of the subject property, consistent with the existing drainage pattern, and ultimately conveyed back to the Black Drain via sheet flow the wetland. A flow spreader will be used to disperse flows into the wetland to avoid creating a confined flow path.

Based on calculations provided by Burnside, the volume of water flowing into the wetland and the drawdown time will increase post-development. The peak inflow rates increase slightly, while the depth of ponding within the wetland will remain largely unchanged. Under existing conditions, water that ponds in the wetland drains away within 1-3 hours; under post-development conditions, the water will drain away over 12-13 hours. It is expected that most wetland plant species would tolerate less than 24 hours of ponding, though it is possible that some vegetation may not be as adaptable to longer detention times. Consequently, there may be a slight change in the vegetation community in some areas toward wetland species that are more tolerant of flooding, but overall, the increased ponding time is unlikely to result in significant changes to the wetland form and function.

Woodlands

The previously approved development required the removal of approximately 3.96 ha of woodlands from the subject property. The previously EISs established that the woodlands did not qualify as significant woodlands and portions were approved for removal through the previous approvals. The majority of these woodlands have since been removed.

The proposed development will require the removal an additional smaller woodland area (ELC unit 8c, **Figure 3**), the majority of which was preserved within the previous development plan as part of an Open Space block. ELC unit 8c is a disturbed woodland area dominated by Manitoba Maple (*Acer negundo*) and dead or dying Green Ash (*Fraxinus pennsylvanica*). Under the previously approved development plan, approximately 0.14 ha of this woodland was impacted. The additional area of woodland loss to accommodate the current proposed development is approximately 0.85 ha.

As noted, it was established through the previous EIS and addenda that none of the woodlands on the subject property meet the County's criteria for designation as significant woodlands. Through previous discussions with the Township, it was agreed that woodland compensation planting would be provided at a 1:1 ratio for the woodland being removed to compensate for loss of Significant Wildlife Habitat. The total loss of woodland and the corresponding area for woodland compensation under the approved development plan was 3.96 ha. Under the proposed development, an additional 0.85 ha of woodland compensation plantings is recommended, for a total of 4.81 ha. It is understood that the proponent is exploring potential off-site locations for woodland restoration with the Township or a cash-in-lieu alternative. Detailed woodland restoration plans will be prepared once a suitable location is confirmed.

The previously approved development plan included a pedestrian trail through the central woodland feature along a former railway berm. The proposed development now includes sidewalks throughout the subdivision on one side of the streets; therefore, this trail is no longer necessary and has been removed from the plans, which avoid impacts on the woodland.

Watercourses

Under the previously approved development plan, the stretch of the former Black Drain between Wellington Rd 19 and the central wetland was to be enclosed, while the remainder of the channel with the subject property would remain open (with the exception of a culvert for a road crossing). Under the proposed development, this section of the drain will be enclosed, which is consistent with the previously approved development.

In addition, under the proposed development plan, a small section of the former Black Drain that currently runs through ELC unit 8c will be diverted beneath Street A just south of the SWM outfall to a drainage channel (behind lots 240-248) along the east property line before connecting back to the existing drain behind Lot 249 (**Figure 2**). Diversion of the section the Black Drain south of the SWM pond will maintain the primary hydrological function of the drainage features, which is conveyance of stormwater to downstream reaches. The previous EISs established that the former Black Drain is a low function feature that is entirely channelized, providing marginal fish habitat and is acting primarily as a stormwater discharge channel for upstream areas. There are no wetland areas associated with the drainage channel and no fish have been observed.

Restoration and enhancement plantings utilizing native species are recommended along the re-aligned drainage corridor.

A permit from GRCA will be obtained for site works within the regulated area, including works associated with the former Black Drain. Pursuant to the Fisheries Act, a project “self-assessment” should be conducted to assess potential impacts on fish habitat. Depending on the outcome of that assessment, if necessary, a request for review (RFR) should be submitted to the Department of Fisheries and Oceans Canada (DFO) in relation to works within the channel.

The previously approved development plan included a pedestrian trail within a private open space block along the Black Drain along the eastern property limit. The proposed development includes sidewalks throughout the subdivision; therefore, this trail is no longer proposed.

Endangered Bats

The proposed development will result in removal of 4.81 ha of woodland. Five species of endangered bats, Little Brown Myotis (*Myotis lucifugus*), Northern Myotis (*Myotis septentrionalis*), Hoary Bat (*Lasiurus cinereus*), Silver-haired Bat (*Lasionycteris noctivagans*) and Eastern Red Bat (*Lasiurus borealis*) were recorded during acoustic monitoring in June 2021 on the subject property. As discussed in the previous EIS submissions and associated correspondence, the results of the monitoring suggested that the woodland communities do not provide maternity roosting habitat and instead provide foraging or flyover habitat. The previous development plan resulted in the removal of 3.96 ha of woodland habitat. Through consultations with the Ministry of Environment, Conservation and Parks (MECP) concerning the previous development plan, it was confirmed that their concerns had been addressed and there were no further comments or requirements concerning Species at Risk bats; however, the three migratory bats (Hoary Bat, Silver-haired Bat and Eastern Red Bat) were not regulated at the time of these approvals, as they were listed on the Species at Risk in Ontario (SARO) list in January 2025.

As discussed, compared to the previously approved plan, the proposed development will result in removal of an additional 0.85 ha of woodland (remainder of ELC unit 8c). Furthermore, as noted, three additional bat species have been subsequently listed as endangered in Ontario. The *Species Conservation Act* (SCA; 2025) came into effect in March 2026, which replaced the *Endangered Species Act* (2007). Section 16 of the SCA prohibits activities that will kill, harm, or damage the habitat of a

species listed on the Protected Species in Ontario List. In order to undertake such activities, the activities need to register with the Species Conservation Registry, which requires the submission of a conservation plan that will typically require the identification of mitigation measures that will protect the species in question. Therefore, the development activities resulting of the additional removal of woodland will need to register and a conservation plan will need to be prepared prior to removal of ELC unit 8c.

Summary of Mitigation and Enhancement Recommendations

A consolidated list of mitigation and enhancement measures from previous EIS submissions and this EIS Addendum, which are recommended to avoid, minimize, and off-set impacts to natural heritage features include:

- Implement an Erosion and Sediment Control (ESC) Plan developed using the Erosion and Sediment Control Guidelines for Urban Construction (TRCA 2019);
- Implement the tree preservation recommendations as per the Arborist Report Addendum and Tree Preservation Plan (Beacon 2026);
- Provide 2:1 replacement for removal of healthy non-woodland trees with a diameter at breast height (DBH) of >10 cm. As per the Arborist Report Addendum (Beacon 2026), 670 replacement trees are recommended and can be achieved through the subdivision landscape plans;
- Implement recommendations of the Hydrogeological Investigation (Gemtec 2026);
- Implement wetland restoration plans to compensate for wetland removal (plans to be updated at detailed design);
- Implement wetland buffer restoration plans (plans to be updated at detailed design);
- Implement woodland management and enhancement plans to improve the ecological functions of the remaining woodlands on the subject property;
- Implement a woodland edge management plan to mitigate impacts on the remaining forest community where new woodland edges are created as a result of tree removals (plans to be updated at detailed design);
- Provide native species plantings along the re-aligned drainage corridor south of the SWM pond outlet and consult with GRCA and DFO to ensure compliance with the *Conservation Authorities Act* and *Fisheries Act*;
- Install permanent fencing along residential lots abutting natural features and buffers to help prevent encroachment-related impacts (e.g., dumping of yard waste, informal trail, removal of vegetation, etc.);
- The federal *Migratory Birds Convention Act* (1994) and provincial *Fish and Wildlife Conservation Act* protect the nests, eggs and young of most bird species from harm or destruction. As the breeding bird season in southern Ontario is generally from early April to August, the clearing of vegetation should occur outside of these periods. For any proposed clearing of vegetation within these dates, or where birds may be suspected of nesting outside of typical dates, an ecologist should undertake detailed nest searches immediately prior to site alteration to ensure that no active nests are present;
- Register activities associated with the removal of additional woodland area (ELC Unit 8c) in relation to endangered bats to ensure conformity with the SCA; and
- Provide 1:1 compensation for the loss of total woodland area (4.81 ha) from the subject property or a cash-in-lieu alternative that could be dedicated to a public agency for off-site woodland restoration within the Township.

Summary

Overall, the currently proposed Draft Plan of Subdivision and grading plan do not affect the overall conclusions and recommendations of Beacon's previous studies. Additional impacts to natural heritage and hydrological features resulting from the proposed development as compared with the previous draft plan include removal of 0.85 ha of woodland and associated bat habitat and realignment of a short segment of the former Black Drain. Conversely, the proposed redevelopment does not require grading within the wetland buffer, nor does it require trails within the central woodland or along the Black Drain, thus reducing the potential for impacts on the woodland, wetland, and drainage features. Impacts on natural heritage and hydrologic features can be avoided, minimized, or offset by implementing the recommendations outlined in this EIS Addendum. A permit will be required from GRCA for works within the regulated area and consultation with DFO is recommended to ensure conformity with the *Fisheries Act*. The proponent will be required to register activities associated with the removal of additional woodland area (ELC Unit 8c) in relation to endangered bats to ensure conformity with the SCA.

Should you have any questions, please contact the undersigned.

Prepared by:
Beacon Environmental Ltd.



Dan Westerhof, B.Sc, M.E.S,
Senior Terrestrial Ecologist,
ISA Certified Arborist (ON-1536A)

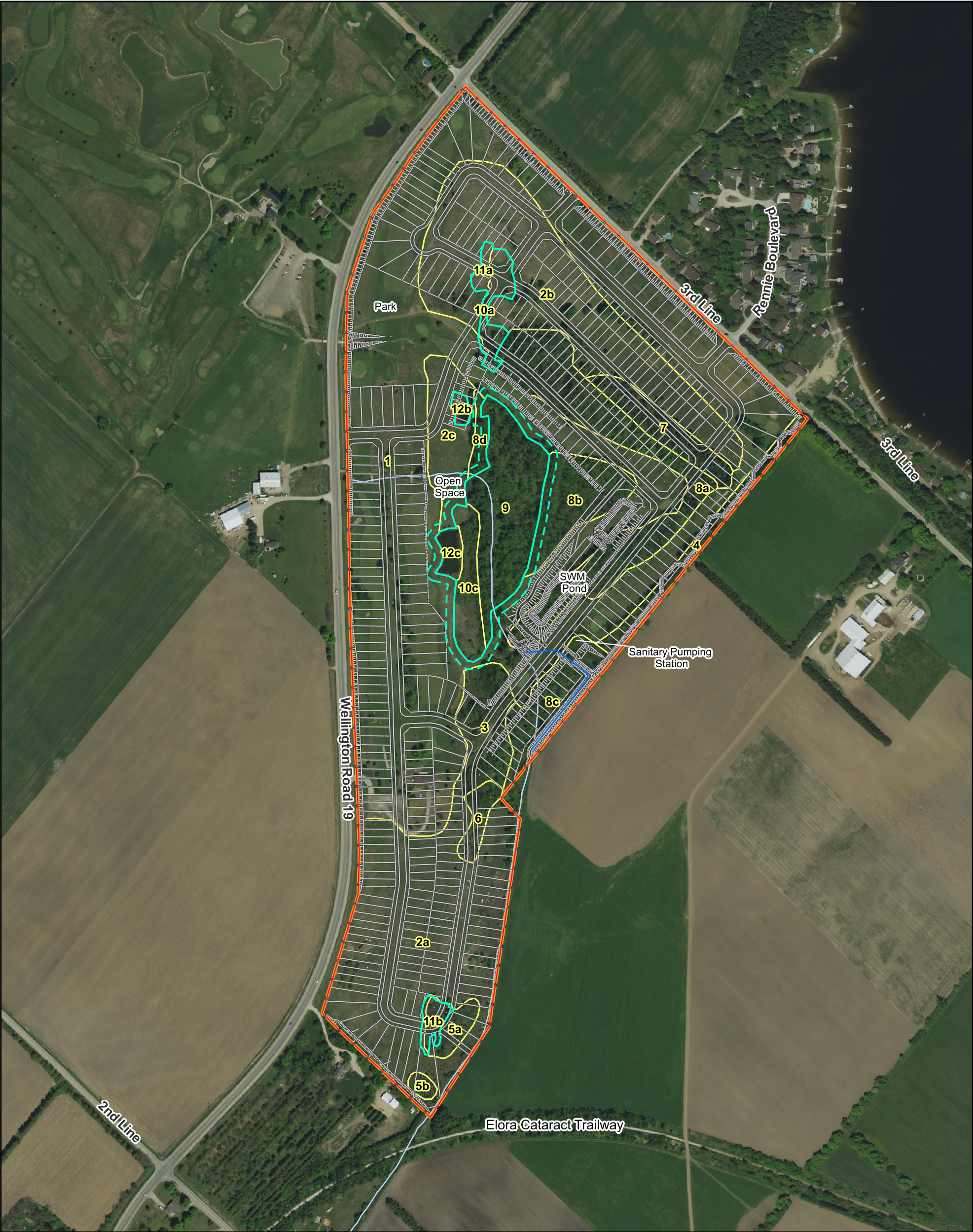
Reviewed by:
Beacon Environmental Ltd.



Carolyn Glass, B.SC. M.E.S,
Senior Ecologist



Site Location		Figure 1
Fergus Golf Club EIS		
		Project: 221111 Last Revised: February 2022
Client: Fergus Development Inc.		Prepared by: BD Checked by: CG
	1:10,500	Inset Map: 1:100,000
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Legend

- Study Area
- Subject Property
- Ecological Communities
- Wetlands (as staked by Beacon on June 23 & July 9 2021 and confirmed by GRCA on September 27, 2021)
- Wetland + 10 m
- Watercourse (MNRF 2021)
- Proposed Development
- Black Drain Diversion

Units	Code	Name
9	SWD2-2	Green Ash Mineral Deciduous Swamp
10	SWT2-2	Willow Mineral Thicket Swamp
11	MAM2-10	Forb Mineral Meadow Marsh
Aquatics Communities		
12	SA	Shallow Water
Forest Communities		
8	FOD7	Fresh - Moist Lowland Deciduous Forest
Cultural Communities		
7	CUP3-2	White Pine Coniferous Plantation
2	CUM1-1	Dry - Moist Old Field Meadow
5	CUW	Cultural Woodland
6	CUT	Cultural Thicket
3	CUM	Cultural Meadow
Other Communities		
1	ANT	Anthropogenic
4	HE	Hedgerow

Proposed Redevelopment

Figure 2

Fergus Golf Club EIS



Project: 221111
Last Revised: June 2026

Client: Fergus
Development Inc.

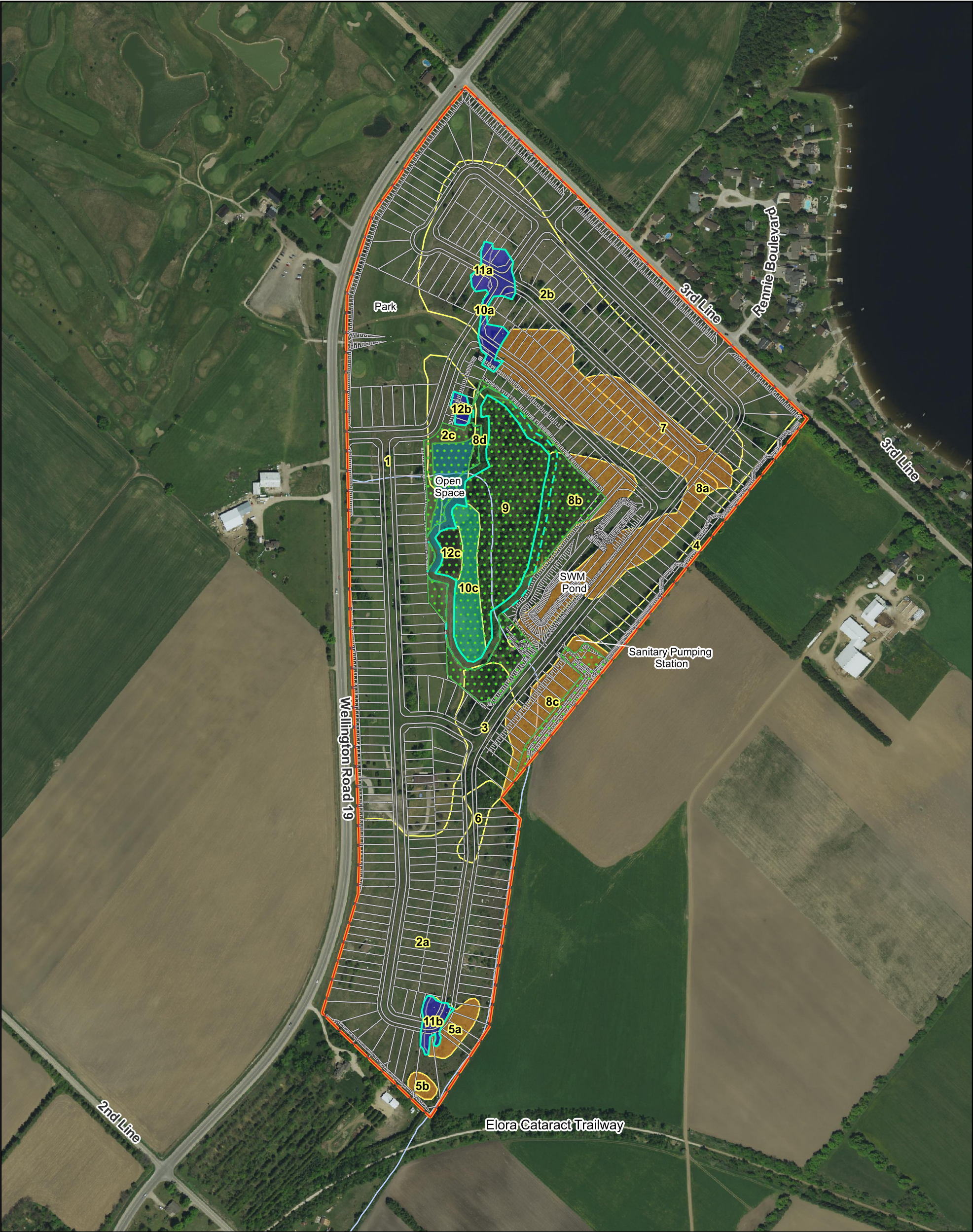
Prepared by: BD
Checked by: CG



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Legend

- Study Area

Subject Property

Ecological Communities

Proposed Development

Watercourse (MNR 2021)

Wetlands (as staked by Beacon on June 23 & July 9 2021 and confirmed by GRCA on September 27, 2021)
- Wetland + 10 m

Wooded Areas To Be Removed

Wetland To Be Removed

Proposed Wetland Compensation Area

Proposed Wetland Enhancement

Open Space to be Retained and Enhanced

Units	Code	Name
9	SWD2-2	Green Ash Mineral Deciduous Swamp
10	SWT2-2	Willow Mineral Thicket Swamp
11	MAM2-10	Forb Mineral Meadow Marsh
Aquatics Communities		
12	SA	Shallow Water
Forest Communities		
8	FOD7	Fresh - Moist Lowland Deciduous Forest
Cultural Communities		
7	CUP3-2	White Pine Coniferous Plantation
2	CUM1-1	Dry - Moist Old Field Meadow
5	CUW	Cultural Woodland
6	CUT	Cultural Thicket
3	CUM	Cultural Meadow
Other Communities		
1	ANT	Anthropogenic
4	HE	Hedgerow

Vegetation Removals and Proposed Compensation

Figure 3

Fergus Golf Club EIS



Project: 221111
Last Revised: June 2026

Client: Fergus Development Inc.

Prepared by: BD
Checked by: CG



1:4,800

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Attachment A



July 12, 2024

BEL 221111

Theyonass Manoharan
Ontario Limited c/o Fergus Development Inc.
3190 Steeles Avenue East, Suite 300
Markham, ON L3R 1G9

via email: theyonasm@geranium.com

Re: Final Environmental Impact Study Addendum for Fergus Golf Club, Township of Centre Wellington, County of Wellington

Dear Theyonass:

Beacon Environmental Limited (Beacon) was retained by 883890 Ontario Limited c/o Fergus Development Inc. to prepare an Environmental Impact Study (EIS) Addendum for the proposed redevelopment of a portion of the Fergus Golf Club, located at 8282 and 8243 Wellington Road 19, Township of Centre Wellington, County of Wellington (hereafter referred to as the "subject property"). The EIS was completed in April 2023 and submitted as part of a *Planning Act* application to redevelop the subject property.

Fergus Development Inc. intends to develop the subject property and has received draft plan approval from the Township of Centre Wellington for Draft Plan of Condominium 23CD-22001.

The original EIS (February 2022), a subsequent EIS revision (April 2023) and an EIS Addendum (December 2023) identified a number of natural heritage features associated with the subject property including wetlands, woodlands, and wildlife habitat. The EIS recommended a 10 m buffer to the centrally located wetland on the subject property, and portions of woodlands within the subject property were also identified for preservation. Several woodland and wetland features were identified for removal to accommodate the proposed development. A number of mitigation recommendations to avoid, minimize, and/or offset impacts to the woodland and wetland features were provided in the EIS, revised EIS, EIS Addendum and a follow up memorandum in response to comments (March 2024). Recommendations included measures to restore and enhance woodland and wetland features within the subject property.

Subsequent comments and draft plan conditions were issued by the Grand River Conservation Authority (GRCA) and the Township.

Notably, Draft Plan Condition #22 issued by the Township states that;

Prior to any grading, site alteration or construction on the subject property, the Owner or its agent shall submit, and obtain final approval from the Township of Centre Wellington of a Final Environment Impact Study (EIS), satisfactory to the Township of Centre Wellington, and the site plan and/or condominium development agreement shall require the implementation of such report. Such Final EIS shall incorporate the following:

- *Provide written confirmation and/or a letter of assurance demonstrating how the requirements of the ESA (2007) have been satisfied, including confirmation that the methods, protocols and recommendations are in accordance with provincial requirements and that, in consultation with the MECP, the requirements of the ESA and other relevant natural heritage policies have been met. Confirmation from the MECP should be provided demonstrating their satisfaction with the applicant's proposed approach to address Bobolink, Eastern Meadowlark, and SAR bat species identified as utilizing woodlands within the subject property. With regard to SAR bats, this should include confirmation that the MECP is satisfied with the assessment of potential bat habitat completed as part of the EIS, despite this assessment excluding individual trees outside of woodland features*
- *It is recommended that confirmation from the MECP also be sought by the applicant regarding the proposed approach to addressing Black Ash within the subject property and whether the proposed development will need to observe the ESA protections afforded to Black Ash.*
- *Provide the analysis and supporting data used to determine the presence/absence of Significant Wildlife Habitat within and adjacent to the subject property in order to effectively demonstrate conformity to the requirements of the PPS and County OP.*
- *Identify the specific measures through which future residential impacts associated with the lots backlotting onto the retained woodland will be avoided or minimized, such as a rear-yard use condition.*

This Final EIS Addendum is intended to provide:

- 1) Additional information to address key agency comments and draft plan conditions;
- 2) A consolidated list of mitigation and enhancement measures to protect, restore, and enhance the natural heritage features associated with the subject property; and
- 3) Confirmation that the findings, recommendations, and conclusions outlined in Beacon's previously submitted studies remain applicable to the second engineering submission;

Agency Comments and Conditions

Grand River Conservation Authority (GRCA) Comments

In their comments on the first engineering submission, the GRCA noted wetland buffer encroachments that were proposed for construction of Street B/D and Street C and adjacent lots and requested details on mitigation options that could be employed to prevent impacts during construction, as well as post-construction treatments of this buffer. To accommodate the proposed road network and lot layout, grading is still proposed within the wetland buffers at these locations, though the extent of grading has been reduced in some areas through the introduction of retaining walls. In these instances, the buffer is reduced to approximately 5 m. These buffer reductions/encroachments to accommodate grading are not expected to have a negative impact on the wetland feature or its functions as the reductions are localized to a few areas and generally there is more than 10 m of separation between the wetland and the development in other areas of the property.

While some grading and a retaining wall is required within the 10 m buffer to achieve the necessary road elevations, this grading is temporary and will be fully restored through naturalized landscaping (see Restoration Landscape Plans [Beacon 2024]) included in this submission package). The Restoration Landscape Plans (Beacon 2024) also include the proposed wetland design in this area to enhance the natural heritage system. Based on the information in the Stormwater Management Plan

(Burnside 2024) and Hydrogeological Report (Gemtec 2024), the water balance as discussed in the 2023 EIS, is expected to be maintained.

To mitigate potential impacts on the wetland during construction, construction activity within 5 m of the wetland edge should be avoided or minimized to the greatest extent possible. Silt fencing/exclusion fencing should be established as far from the wetland edge as possible during construction to avoid direct impacts on the wetland and minimize disturbance to the buffer. As noted, all buffer areas impacted by the grading will be restored through detailed buffer restoration and enhancement plans, included in this submission package.

Township Comments and Draft Plan Conditions

Trails

In their comments, the Township's peer review consultant, Natural Resource Solutions Inc. (NRS) indicated that potential impacts of a proposed pedestrian trail were not adequately addressed in the previous submission and requested additional details regarding the trail location, design, and potential impacts.

A pedestrian trail is proposed through Woodland Unit 1, which will follow an existing berm associated with an abandoned rail line that divides the SWD2-2 and FOD7 communities. The proposed trail is 3 m wide and will be constructed of crushed limestone or woodchips.

Construction of the trail will require removal of some potential hazard trees as well as understory vegetation (shrubs, ground covers) that has established since the railway was abandoned. There are an estimated 50 dead or dying trees along the proposed trail which may need to be removed or reduced in to mitigate potential risk to trail users.

It is important to note that providing controlled access to natural features through a formalized trail system can help prevent the development of informal trails. However, it is also acknowledged that in some cases creating trails through natural features could potentially introduce disturbances (e.g. pedestrians venturing off-trail into sensitive areas, allowing dogs off-leash). In this case, the risk of such impacts will be reduced by the fact that there is a grade separation between the trail and the adjacent forest floor (trail will be located on an existing raised berm) and there is a dense understory vegetation that will naturally deter pedestrian from straying off trail. However, to further minimize the potential for impacts on the woodland resulting from increased pedestrian access, it is recommended that educational signs be posted at the trail entry points to the woodland advising trail users to stay on the trail and keep dogs leashed (see Restoration Landscape Plans [Beacon 2024]) included in this submission package).

Species at Risk

As noted above, Draft Plan Condition #22 issued by the Township requires that the applicant provide confirmation that the proposed development is in conformance with the *Endangered Species Act* (ESA).

These conditions were addressed through a previous EIS Addendum (December 2023) (**Attachment A**) and a subsequent memorandum to the Township (March 26, 2024) (**Attachment B**).

Significant Wildlife Habitat

Draft Plan Condition #22 issued by the Township requires that the applicant:

- *Provide the analysis and supporting data used to determine the presence/absence of Significant Wildlife Habitat within and adjacent to the subject property in order to effectively demonstrate conformity to the requirements of the PPS and County OP.*

This condition was addressed through a previous EIS Addendum (December 2023) (**Attachment A**) and a subsequent memorandum to the Township (March 26, 2024) (**Attachment B**).

However, subsequent comments from NRSI requested further clarification related to impacts on woodland features that were identified as Significant Wildlife Habitat (SWH) for bat maternity colonies through the application of the provincial guidelines, Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E (OMNRF 2015).

In their email of June 22, 2024, NRSI provided the following comments to address related to impacts on bat maternity colonies:

- *Mapping identifying the extent of SWH within the property has not been identified. Similarly, mapping or details on the total area of SWH removed has not been identified. In our opinion, these details are required in order for a fulsome impact assessment to have been completed.*
- *In discussing offsetting the loss of the SWH within the property, the EIS addendum and March 26 memo note that the central portion of woodland will be retained, where SWH has also been confirmed. While we agree that this could ensure that the SWH function remains on the property, the removal of other SWH woodland areas still amounts to a net loss in bat maternity colony habitat within the property. This is important since the OP and PPS both require that no negative impacts be demonstrated for the ecological function of SWH but also the habitat/feature itself.*
- *The addendum and memo note large off-site woodlands that are likely to support this SWH. While this may be likely, it isn't clear if any evaluation was actually done on the off-site woodlands to demonstrate this. Regardless, the presence of off-site woodlands doesn't negate the reduction of woodlands + SWH within the property.*
- *The March memo notes that 1:1 woodland compensation planting will be completed to offset the SWH woodland removal. I assume this will be on the adjacent golf course property? We agree that this could offset the loss of SWH from within the property on a local scale but without greater detail or some proof of concept to demonstrate that this compensation area can be created we aren't in aren't able to agree that the initial impact will be offset.*

The extent of candidate SWH for bat maternity colonies is illustrated in **Figure 1**. The total of area of candidate SWH that will be retained and enhanced within the subject property is 3.43 ha. The total area removed is 3.25 ha.

Within the landscape context, there remain large tracts of forested area which represent suitable habitat for bat maternity roosting, though usage of these features by bats has not been confirmed. From this perspective, the impact on bat maternity roost habitat resulting from tree removals from the subject property are relatively minor as the removals will not eliminate or significantly reduce the amount of bat maternity roost habitat in the area. However, it is acknowledged that the loss of woodland from the subject property is an impact on this SWH; therefore, woodland compensation plantings are proposed (1:1 replacement) to off-set this loss. At this time, the applicant is exploring opportunities with the Township and public agencies for woodland restoration off-site. Detailed woodland restoration plans

will be provided once a suitable location is confirmed. To more immediately mitigate for the tree removal, four bat boxes are proposed along the woodland edge within the subject property, each of which can support up to 400 bats (see Restoration Landscape Plans [Beacon 2024]) included in this submission package).

Mitigation for Residential Encroachments onto Retained Woodlands

Draft Plan Condition #22 issued by the Township requires that the applicant:

- *Identify the specific measures through which future residential impacts associated with the lots backlotting onto the retained woodland will be avoided or minimized, such as a rear-yard use condition.*

Rear yard fencing and edge plantings are proposed to mitigate this impact. Refer to Woodland Management Plan (Beacon 2024) and Edge Management Plan drawings (Beacon 2024) included in this submission package.

Summary of Mitigation and Enhancement Recommendations

A consolidated list of mitigation measures that are recommended to protect, restore, and enhance the natural heritage features include:

- Implement an Erosion and Sediment Control Plan will be developed using the Erosion and Sediment Control Guidelines for Urban Construction (2019);
- Implement the tree preservation recommendation of the Arborist Report Addendum (Beacon 2024);
- Provide 2:1 replacement for removal of healthy non-woodland trees >10 cm DBH. As per the Arborist Report Addendum (Beacon 2024), 670 replacement trees are recommended and can be achieved through the subdivision landscape plans (GSP Group 2024);
- Implement recommendations of the Hydrogeological Investigation (WSP 2023);
- Implement wetland restoration plans to compensate for wetland removal (Beacon 2024);
- Implement wetland buffer restoration plans (Beacon 2024);
- Implement woodland management and enhancement plans (Beacon 2024) to improve the ecological functions of the remaining woodlands;
- Implement a woodland edge management plan (Beacon 2024) to mitigate impacts on the remaining forest community where new woodland edges are created as a result of tree removals;
- Where grading is required within 10 m of the wetland, construction activity within 5 m of the wetland edge should be avoided or minimized to the greatest extent possible. Silt fencing/exclusion fencing should be established as far from the wetland edge as possible to avoid direct impacts on the wetland and minimize disturbance to the buffer. All buffer areas impacted by the grading be restored through detailed buffer restoration and enhancement plans;
- Install fencing along residential lots abutting natural features and buffers to help prevent encroachment-related impacts (e.g., dumping of yard waste, informal trail, removal of vegetation, etc.);
- The federal *Migratory Birds Convention Act* (1994) and provincial *Fish and Wildlife Conservation Act* protect the nests, eggs and young of most bird species from harm or destruction. As the breeding bird season in southern Ontario is generally from early April to August, the clearing of vegetation should occur outside of these periods. For any proposed

clearing of vegetation within these dates, or where birds may be suspected of nesting outside of typical dates, an ecologist should undertake detailed nest searches immediately prior to site alteration to ensure that no active nests are present;

- Removal of woodland features should be conducted between October 1 and March 31 to avoid the bat roosting period; and
- Provide 1:1 compensation for the loss of total woodland area (3.96 ha), including that noted above as SWH, from the subject property or a cash-in-lieu alternative that could be dedicated to a public agency for off-site woodland restoration within the Township.

Summary

In summary, the current draft plan of subdivision and grading plan do not affect the overall conclusions and recommendations of Beacon's previous studies and investigations.

Should you have any questions, please contact the undersigned.

Prepared by:
Beacon Environmental Ltd.



Dan Westerhof, B.Sc, M.E.S,
Senior Terrestrial Ecologist,
ISA Certified Arborist (ON-1536A)

Reviewed By:
Beacon Environmental Ltd.



Carolyn Glass, B.SC. M.E.S,
Senior Ecologist



Legend

- Subject Property
- Ecological Communities
- Watercourse (MNR 2021)
- Proposed Development
- Pedestrian Trail
- Candidate SWH Bat Maternity Colonies to be Preserved and Enhanced (3.43 ha)
- Candidate SWH Bat Maternity Colonies to be Removed (3.25 ha)

Code	Wetland Communities
SWD2-2	Green Ash Mineral Deciduous Swamp
	Forest Communities
FOD7	Fresh - Moist Lowland Deciduous Forest

Candidate Significant Wildlife Habitat (Bat Maternity Colonies)

Figure 1

Fergus Golf Club EIS



Project: 221111
Last Revised: July 2024

Client: Fergus Development Inc.

Prepared by: BD
Checked by: CG



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Attachment A

December 21, 2023

BEL 221111

Theyonas Manoharan
Project Manager, Land Development
Geranium
3190 Steeles Avenue East, Suite 300
Markham, ON L3R 1G9

Re: Environmental Impact Study Addendum, Fergus Golf Course Redevelopment, County of Wellington

Dear Mr. Manoharan:

Beacon Environmental Limited (Beacon) was retained by 883890 Ontario Limited c/o Fergus Development Inc. to prepare an Environmental Impact Study (EIS) for the proposed redevelopment of a portion of Fergus Golf Club, located at 8282 and 8243 Wellington Road 19, Township of Centre Wellington, County of Wellington (hereafter referred to as the “subject property”). The EIS was completed in April 2023 and submitted as part of a *Planning Act* application to redevelop the subject property.

Fergus Development Inc. intends to develop the subject property and has received draft plan approval from the Township of Centre Wellington for Draft Plan of Condominium 23CD-22001.

As part of draft plan conditions, an EIS addendum was requested to address *Endangered Species Act* (ESA) requirements, Significant Wildlife Habitat (SWH) and rear lots where they abut retained woodlands. Further, compliance with the *Fisheries Act* with respect to the Black Drain was to be demonstrated.

Endangered Species Act

Avian Grassland Species

The provincially threatened Eastern Meadowlark (*Sturnella magna*) and Bobolink (*Dolichonyx oryzivorus*) were confirmed breeding on the subject property within the northern and southern meadows (during the June 2021 breeding bird surveys). One Bobolink breeding territory and one Eastern Meadowlark breeding territory were recorded in the southern meadow and one Eastern Meadowlark breeding territory was recorded in the northern meadow. Under the habitat regulations for these species, it is possible to remove the habitat provided suitable new habitat is created within the same ecoregion (Ontario Regulation [O. Reg.] 830/21), or a payment is made to the Species at Risk Conservation Fund (O. Reg. 829/21). Both options under the ESA are presented below to address these meadow habitat removals and ensure compliance with the regulations.

Prior to commencing the removal of Bobolink and Eastern Meadowlark habitat, a notice of activity form must be submitted online through the Ministry of Environment, Conservation and Parks (MECP) registry (Section 14 of O. Reg. 830/21). In this form, a description of the activity, in this case the removal of meadow habitat, must be included along with the area of habitat, proposed start and end dates of the activity and which grassland bird species use the area as habitat.

Before carrying out the activity, a Bobolink and Eastern Meadowlark management plan must be prepared as detailed in Section 16 of O. Reg. 830/21. This includes information on the activity timeline and description, which regulated grassland bird species is using the habitat where the activity is proposed, details on the location and area of the impacted habitat and a description of the mitigation measures taken to minimize impacts of the activity on the regulated habitat. This management plan must be retained for at least five years after the activity is complete and must be provided to the MECP upon request.

The Species Conservation Charges regulation (O. Reg. 829/21) involves similar steps as above, however, as of April 29, 2022, the option to pay into the Species Conservation Fund in place of creating or enhancing habitat became available. This total cost replaces the steps in O. Reg. 830/21 to create or enhance habitat, and manage and monitor this habitat for the 20 year period. If the payment option is chosen, this payment must be made at least one day before the activity begins or within 30 days after registering the activity, whichever is earlier.

Either of these options, including the filing of the appropriate notice of activity, will ensure compliance with the ESA.

Endangered Bat Species

Two species of endangered bats, Little Brown Myotis and Northern Myotis, were recorded during acoustic monitoring in June 2021 within the central woodland communities on the subject property. The results of the monitoring suggested that the woodland communities do not provide maternity roosting habitat and instead provide foraging or flyover habitat. ELC communities 8b and 8c will be retained as part of the proposed redevelopment plan to continue to provide foraging and flyover habitat for these species. The full results of the bat habitat assessment and acoustic monitoring have been submitted to MECP for review. While MECP has indicated this is a proponent driven process, their concurrence with the assessment as presented above (that the woodlands do not provide maternity roosting habitat for endangered bats and that the removal of trees on the subject property does not contravene the ESA) is being sought.

Black Ash

As of the time of writing, Black Ash (*Fraxinus nigra*) is not protected under the ESA. Per the Environmental Registry of Ontario September 18, 2023 posting,

Ontario is now proposing regulations that will set out how ESA protections will apply to Black Ash when the period of temporary suspension ends on January 25, 2024 and will set out a new conditional exemption for Black Ash that are protected under the ESA. If necessary, the government will consider extending the temporary pause in protections

for Black Ash until no later than January 2025 so that the proposed regulatory approach can be implemented.

Beacon will continue to monitor the Registry notices to ensure that the proposed development is compliant with the ESA with respect to Black Ash.

Significant Wildlife Habitat

According to the *Significant Wildlife Habitat Technical Guidelines* (OMNRF 2000), there are four broad categories of SWH:

- Seasonal Concentration Areas of Animals;
- Rare Vegetation Communities or Specialized Habitat for Wildlife;
- Habitat for Species of Conservation Concern; and
- Animal Movement Corridors.

Within each of the above general categories, there are multiple types of SWH, each of which are intended to capture a specialized type of habitat that may or may not be captured by other existing feature-based categories (e.g., significant wetlands, significant woodlands).

Very few municipalities have provided their own criteria or thresholds, but some have, and in many cases the thresholds are higher than those suggested by the Ministry of Natural Resources and Forestry (MNRF). Neither the County of Wellington, nor the Township of Centre Wellington have established their own criteria for the determination of SWH.

The Province has provided Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E ("MNRF Guidelines"; OMNRF 2015) with suggested guidance for the SWH designation for the four categories of SWH outlined in the Significant Wildlife Habitat Technical Guide and its Appendices (OMNR 2000).

Regarding these guidelines the Province notes that:

They are advisory only and may be updated as technology or techniques improve. They provide information to assist in understanding the policy. They do not add to or detract from policy. Except as otherwise specified (e.g. where requirements are established by legislation or regulation), they do not represent the only acceptable approaches.

In regard to SWH, the PPS defines significant as follows:

Significant: means:

d) In regard to other features and areas, ecologically important in terms of features, functions, representation or amount, and contributing to the quality and diversity of an identifiable geographic area or natural heritage system.

The following SWH sub-categories in the context of the suggested MNRF Guidance have been considered for this location.

Raptor Wintering Area

The MNRF Guidelines consider raptor wintering sites to be woodlands over 20 ha. This size of woodland is not present on the subject property.

Bat Maternity Colonies

Per the MNRF Guidelines, candidate SWH under this category includes forested and swamp ecosites. Habitat criteria includes mature deciduous or mixed forest stands with high densities (>10/ha) of suitable trees containing cavities (>25 cm DBH).

Acoustic Monitoring revealed the presence of Big Brown Bat (*Eptesicus fuscus*) and Silver-haired Bat (*Lasionycteris noctivagans*) within the woodlands on the subject property. It is likely more than 10 individuals are present and therefore, per the guidelines, SWH is present for these species. While some of these woodlands are to be removed, a large central portion will be retained and will continue to provide habitat. Further, the proposed Woodlot Management Plan (Beacon 2023a; provided under separate cover) will enhance and restore the retained woodland communities. Further, within <1 km of the subject property, there are three large contiguous woodland areas that are approximately 22 ha, 45 ha and 25 ha, respectively. Given the area of woodland removal compared to the surrounding landscape, it is anticipated that the habitat function will not be impaired.

Tree removals should only occur between October 1 and March 30, so as to not interfere with bat roosting.

Reptile Hibernaculum

While specific surveys were not conducted, no snakes were observed during any of the field investigations. No hibernaculum or congregations were observed within the subject property and therefore it is not considered SWH per the MNRF Guidelines.

Turtle Wintering Areas

Surveys for basking turtles within the ponds on the study area did not record any turtles using the habitat within the subject property. Further, these anthropogenic golf course ponds should not be considered SWH per the MNRF Guidelines.

Deer Winter Congregation Areas

This area is not considered a deer winter congregation area, since it is not identified as such by MNRF (MNRF deer wintering areas on LIO mapping).

Woodland Raptor Nesting Habitat

Breeding bird surveys in 2021 on the subject property did not reveal any observations of raptors.

Turtle Nesting Areas

Surveys for basking turtles within the ponds did not record any turtles using the habitat within the subject property. No turtle nests were observed.

Amphibian Breeding Habitat (Woodland)

The MNRF Guidelines indicate SWH includes the presence of a breeding population of one or more of the listed newt/salamander species or two or more of the listed frog species with at least 20 or more individuals or full chorus vocalizations. None of the listed salamander or newt species were encountered. Two of the listed frog species were recorded, but at lower calling levels. In this regard, the subject property would not be considered SWH.

Amphibian Breeding Habitat (Wetland)

With respect to this category, American Toad, Gray Treefrog, and Green Frog were confirmed present during the 2021 amphibian breeding survey, but none recorded at a call level code of 3. In this regard, the subject property would not be considered SWH.

Woodland Area-Sensitive Bird Breeding Habitat

None of the listed species were recorded during 2021 breeding bird surveys. The woodlands on site are not considered SWH in this category.

Marsh Bird Breeding Habitat

None of the listed species were recorded during 2021 breeding bird surveys. The marshes on site are not considered SWH in this category.

Open Country Bird Breeding Habitat

Only one indicator species, Savannah Sparrow was recorded under this category. Since the presence of nesting or breeding of 2 or more of the listed species is required for significance, open country bird breeding SWH is not present.

Special Concern and Rare Wildlife Species

The category of special concern and rare wildlife species includes species that are rare and have experienced significant population declines in Ontario. This includes S1-S3 wildlife per the Natural Heritage Information Centre, and those listed as Special Concern. One Eastern Wood-Pewee pair was present as a breeding species on the subject property. This bird species is relatively common and widespread. While the presence of any one of these Special Concern species would trigger SWH designation through application of the MNRF Guidelines, a single observation of Eastern Wood-Pewee,

in our professional opinion, should not confer SWH status. The habitat may be protected by the presence of other features.

Terrestrial Crayfish

While some marsh areas existing within the subject property, no Terrestrial Crayfish or their chimneys were observed on site.

Summary

In summary, this analysis, using the MNRF Guidance, has considered that only Bat Maternity Colony SWH exists within the subject property. Some of this habitat (i.e., the woodlands) will remain and will be enhanced through the proposed redevelopment. Further, within <1 km of the subject property, there are three large contiguous woodland areas that are approximately 22 ha, 45 ha and 25 ha, respectively. Given the area of woodland removal compared to the surrounding landscape, it is anticipated that the habitat function will not be impaired. All tree removals on the subject property should occur outside the bat roosting season (i.e., tree removals shall occur between October 1 and March 30).

Retained Woodlands

In some areas of the plan, removal of vegetation from portions of the retained woodlands is required to accommodate grading and lots. As per the Woodlot Management Plan (Beacon 2023a; submitted under separate cover),

Where encroachment occurs within woodlands, aside from the direct removal of vegetation within the development footprint, other impacts to the remaining forest community may include:

- *Trees along the new edge may be susceptible to windthrow;*
- *Reduced species richness and abundance;*
- *Damage to root systems of trees, resulting in root stress/tree decline;*
- *Loss of canopy cover/shade, resulting in an increase in sunlight penetration;*
- *Some trees with thinner bark (e.g. Beech) can be susceptible to sunscald and frost cracking due to changes in light penetration. This can weaken the tree's defences, particularly to pathogens;*
- *Changes in microclimates (increased temperatures, decreased soil moisture) resulting in desiccation; and*
- *Site may be more susceptible to invasion by non-native species, pathogens, etc.*

To mitigate these impacts, an edge management planting plan is recommended. The plan should include planning native trees and shrubs along the disturbed forest edge to provide a protective "buffer". Planting plans should include a diversity of species that are compatible with the existing forest and of sufficient density to provide some immediate level of protection. Fast-growing edge species that are adapted to the conditions found

along edges/disturbed areas are recommended. An Edge Management Plan will be submitted under separate cover.

Through the development of an Edge Management Plan (EMP), further details regarding these buffer areas will be presented.

Black Drain

The Black Drain is a low function feature that is entirely channelized, acting primarily as a stormwater discharge channel for upstream areas. Results of the hydrogeological study do not suggest groundwater inputs to the channel. There are no wetland areas associated with the drainage channel and no fish have been observed within the drainage feature. Further, observed flow does not support fish habitat throughout the feature.

In June 2023, the Corporation of the Township of Wellington passed a by-law to abandon a portion of the drain,

Now Therefore the Council of the Corporation of the Township of Centre Wellington hereby enacts as follows:

- 1. That part of the Black Drainage Works, from Sta. A19+66 upstream to Sta. A0+00, all of 'D' Drain tile and all of 'G' Drain tile, all located on E ½ Lot 10 Con. 3 including County Road No. 19 and Township 3rd Line Road, is hereby abandoned.*

While a portion of the Black Drain has been abandoned, its overall function (stormwater conveyance) will continue post development, with the exception of a small (<100 m section) south of County Road 19 within an ephemeral grass ditch in the former golf course lands. A constructed, compensation wetland is proposed upstream of the existing wetland to where the drain currently flows (see landscape Restoration Concept (Beacon 2023b; provided under separate cover). This area will enhance the overall function of the drainage system. In this regard, no impacts to fish or fish habitat are anticipated and compliance with the *Fisheries Act* is met.

Report prepared by:
Beacon Environmental



Carolyn Glass, B.Sc. M.E.S.
Senior Ecologist

Report reviewed by:
Beacon Environmental



Jamie Nairn, M.Sc., P.Ag.
Senior Ecologist



Attachment B



Memorandum

To: Brett Salmon, Managing Director of Planning & Development – Township Centre Wellington

cc: Andrea Kelly and Theyonas Manoharan (Geranium)

From: Carolyn Glass (Beacon Environmental Ltd.)

Date: March 26, 2024

Ref.: 221111

Re: Comment Response – Natural Resource Solutions Inc. Peer Review of the Fergus Golf Club Redevelopment 1st Engineering Submission

Beacon Environmental Limited (Beacon) appreciated the Peer Review provided by Natural Resource Solutions Inc. (NRSI; February 2024) of the 1st Engineering Submission for 883890 Ontario Limited c/o Fergus Development Inc. for the proposed redevelopment of a portion of the Fergus Golf Club. This included a review of the following materials which were prepared by Beacon:

- Environmental Impact Study Addendum, Fergus Golf Course Redevelopment, County of Wellington. (December 2023);
- Arborist Report, Fergus Golf Course Redevelopment, Township of Centre Wellington, Wellington County. (December 2023); and
- Woodlot Management Plan, Fergus Golf Course Redevelopment, Township of Centre Wellington, Wellington County (December 2023).

While this memorandum does not provide a fulsome response to all comments, it addresses the items within the “recommendations” of the report which apply to the proposed woodland removals. As there is the potential for bats to use the woodlands, the removal of these woodlands is proposed prior to April 1, 2024. Details regarding Edge Management Plans, monitoring of plant material and the trail will be provided at a later date through the response to detailed design comments. We note that the trail discussed in the Woodlot Management Report is an existing former rail trail/golf cart path, and it not a new trail to be located within the woodland requiring any tree removals, beyond those would be considered a hazard to trail users.

Endangered Species Act

Four species protected under the *Endangered Species Act* (ESA) were identified on the subject property. Each of these is addressed below. The ESA is administered by the Ministry of Environment,

Memorandum

Conservation and Parks (MECP) and all legislation and recommendations from MECP will be followed, as required.

Bobolink and Eastern Meadowlark

While these species do not utilize woodlands, the meadow areas within the subject property will be removed at this time. Bobolink (one pair), Eastern Meadowlark (two pairs) were recorded on the subject property during breeding bird surveys in 2021. These species were found in the northern and southern cultural meadow areas. Bobolink and Eastern Meadowlark have been addressed via Ontario Regulation (O. Reg) 829/21 (Confirmation # M-102-1558832637), wherein the species have been registered and payment to the Species at Risk Conservation Fund has been made.

Black Ash

In January 2022, Black Ash received a Minister's Order for Temporary Suspension for two years from the time it was added to the Species at Risk in Ontario (SARO) List regulation. This suspension was lifted in January 2024. While the species listing was suspended, 883890 Ontario Limited c/o Fergus Development Inc. received Draft Plan of Subdivision Approval in October 2023.

The species is listed as a "relevant species" in Table 2 of O. Reg 242/08, under Section 23.13, and approved draft plan of subdivision is listed as the "regulatory condition" in Table 1. In this regard, the species qualifies for the transition exemption (O. Reg 242/08, Section 23.13) and was registered accordingly (Confirmation # M-102-2560246861). A Mitigation Plan will be prepared and followed per the regulation and provided to MECP.

Endangered Bats

An Information Gathering Form (IGF) detailing the site, the proposed development and all endangered and threatened species observed on the subject property has been submitted to MECP. This IGF was submitted at the request of MECP to address woodland removals with respect to endangered bats. As of March 25, 2024, comments on this IGF have been received by MECP and responses have been provided.

A response from MECP (J. Cameron) was received on March 26, 2024 (**Attachment A**). MECP indicated, in part,

I have reviewed the comments and updated IGF submitted yesterday evening. Based on the responses, MECP's concerns have been addressed and there is no further comments concerning Species at Risk bats at this time. The ministry's position here is based on the information that has been provided to MECP by the Beacon Environmental project team.

Further,

MECP acknowledges mitigation measures will be put in place to protect species at risk bats and the remaining forested area on site (as indicated by the responses to MECP comments).

In this regard, MECP approval regarding endangered bats has been received.

Significant Wildlife Habitat

As noted in the EIS, the determination of Significant Wildlife Habitat (SWH) is the responsibility of the Planning Authority. Very few municipalities have provided their own criteria or thresholds. Neither the County of Wellington, nor the Township of Centre Wellington have established their own criteria for the determination of SWH. In this regard, an assessment using the provincial guidance was prepared at the request of NRSI. The provincial guidance is provided in the form of Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E (OMNRF 2015).

Regarding these guidelines the Province notes that:

They are advisory only and may be updated as technology or techniques improve. They provide information to assist in understanding the policy. They do not add to or detract from policy. Except as otherwise specified (e.g. where requirements are established by legislation or regulation), they do not represent the only acceptable approaches.

Using the guidelines, it was determined that candidate SWH for Bat Maternity Colonies exists insofar as the property includes forested and swamp ecosites with mature deciduous or mixed forest stands with high densities (>10/ha) of suitable trees containing cavities (>25 cm DBH).

Acoustic monitoring revealed the presence of Big Brown Bat (*Eptesicus fuscus*) and Silver-haired Bat (*Lasionycteris noctivagans*) within the woodlands on the subject property. It is likely more than 10 individuals are present and therefore, per the guidelines, SWH is present for these species. While some of these woodlands are to be removed, a large central portion of woodlands (3.7 ha) will be retained and will continue to provide habitat. Further, the proposed Woodlot Management Plan will enhance and restore the retained woodland communities.

In order to mitigate any potential impacts to bat species, the proponent is committed to implementing the following woodland enhancement and compensation measures as required through the Draft Plan Conditions of Approval provided by the Township:

- Preservation of 3.70 ha of woodland, of which 1.92 ha is swamp, regulated by Grand River Conservation Authority, which provides potential roosting and foraging habitat. These lands are to remain Open Space.
- A detailed woodland management plan has been developed for the 3.70 ha of woodland to be retained. The management plan includes underplanting of deciduous trees and invasive species management of shrubs to support the long-term ecological trajectory of this feature as a woodland due to the loss of the ash canopy.
- Woodland compensation planting at a 1:1 ratio for the woodland being removed. Tree species targeted for planting will include those with bat roosting capabilities including: Freeman Maple (*Acer x freemanii*) and Bur Oak (*Quercus macrocarpa*).

Memorandum

- Edge management planting for the area of woodland to be preserved. Edge Management Plans will be prepared to mitigate for edge effects and will include planting native trees and shrubs along the disturbed forest edge to provide a protective buffer. Planting plans will include a diversity of species that are compatible with the existing forest and of sufficient density to provide some immediate level of protection. Fast-growing edge species that are adapted to the conditions found along edges/disturbed areas will be utilized.

Even though the Township and the County have not designated SWH, a conservative approach was taken, and the provincial guidance was applied to address the potential for maternity bat colonies on site. Given the above measures, negative impacts are not anticipated.



Attachment A

From: [Cameron, Jayme \(MECP\)](#)
To: [Carolyn Glass](#)
Cc: theyonasm@geranium.com
Subject: RE: Fergus Golf Club, Centre Wellington - SAR Bat Habitat Assessment and Acoustic Monitoring and Next steps
Date: March 26, 2024 1:55:21 PM
Attachments: [image001.png](#)
[image002.png](#)

Hello Carolyn,

I have reviewed the comments and updated IGF submitted yesterday evening. Based on the responses, MECP's concerns have been addressed and there is no further comments concerning Species at Risk bats at this time. The ministry's position here is based on the information that has been provided to MECP by the Beacon Environmental project team. Should information not have been made available and considered in MECP's review or new information come to light that changes the conclusions made, or if on-site conditions and circumstances change so as to alter the basis for the conclusions, please contact the Species at Risk Branch as soon as possible to discuss next steps

The IGF is intended to be a self contained standalone document. Although I have no further questions/concerns, for accurate record keeping, it would be pertinent to include Beacon's responses to comments 3, 6, 7 and 8 of the excel document in the IGF itself. This will ensure that all available information is presented in a single form should the need ever arise to revisit the project. If you are able to incorporate those responses into the IGF and submit it to me, it would be greatly appreciated.

Should any of the project activities change, please notify MECP immediately to obtain advice on whether the changes require authorization under the ESA. Failure to carry out these activities as described could potentially result in contravention of the ESA. Further, it is recommended that the proponent and their project team continue to monitor for Species at Risk Bats activity and other species at risk while carrying out the activities and to document changes, in the event that there should be any. The proponent remains responsible for ensuring compliance with the ESA and may be subject to prosecution or other enforcement action if activities result in any harm to an at-risk species or habitat. The proposed activities may be subject to other approvals, such as those issued by local municipalities and conservation authorities Please be advised that it is the responsibility of the proponent to be aware of and comply with all other relevant provincial or federal requirements, municipal by-laws or required approvals from other agencies. It is also the responsibility of the proponent to ensure that all required approvals are obtained, and relevant policies adhered to.

MECP acknowledges mitigation measures will be put in place to protect species at risk bats and the remaining forested area on site (as indicated by the responses to MECP comments). We encourage the proponent to carry out such mitigation measures and other best management practices as it deems appropriate. MECP recommends that vegetation removal within the project area be kept as minimal as possible and that effort be put towards re-naturalizing any disturbed areas as necessary. Furthermore, MECP recommends that the planting plan to compensate for

habitat removal be submitted when it is ready so that it may be filed with the IGF.

If you have any further questions or concerns moving forward, please feel free to reach out.

Kind regards,

Jayme Cameron MES, BSc.

Management Biologist

Permissions Unit | Species at Risk Branch (SARB)

Ontario Ministry of the Environment, Conservation and Parks (MECP)

Email: jayme.cameron@ontario.ca | **P:** 613-451-0736



From: Carolyn Glass <cglass@beaconenviro.com>

Sent: March 26, 2024 11:35 AM

To: Cameron, Jayme (MECP) <Jayme.Cameron@ontario.ca>

Cc: theyonasm@geranium.com

Subject: RE: Fergus Golf Club, Centre Wellington - SAR Bat Habitat Assessment and Acoustic Monitoring and Next steps

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Thank you Jayme. Much appreciated.

Carolyn

Carolyn Glass, B.Sc., MES / Senior Ecologist (she/her)

BEACON ENVIRONMENTAL

80 Main St. North, Markham, ON L3P 1X5

T) 905.201.7622 x231 C) 416.838.7967

www.beaconenviro.com

From: Cameron, Jayme (MECP) <Jayme.Cameron@ontario.ca>

Sent: Tuesday, March 26, 2024 11:23 AM

To: Carolyn Glass <cglass@beaconenviro.com>

Cc: theyonasm@geranium.com

Subject: RE: Fergus Golf Club, Centre Wellington - SAR Bat Habitat Assessment and Acoustic Monitoring and Next steps

Hi Carolyn,